## Cooley

## MEMORANDUM ENDORSED

Via CM/ECF

Aric H. Wu T: +1 212 479 6550 ahwu@cooley.com

December 13, 2023

The Honorable Gregory H. Woods **United States District Court** Southern District of New York 500 Pearl Street, Room 2260 New York, New York 10007

**USDC SDNY DOCUMENT ELECTRONICALLY FILED** DOC #: DATE FILED: 12/15/2023

Madhu v. Socure Inc., Case No. 1:22-cv-00682-GHW (S.D.N.Y.) Re:

Dear Judge Woods:

We represent Defendant Socure Inc. ("Socure") in the above-captioned matter. Pursuant to Rule 4(A) of this Court's Individual Rules of Practice in Civil Cases and Rule 21.7 of the Southern District of New York's ECF Rules and Instructions, we respectfully request that the Court seal Dkt. No. 67-3, which was Exhibit 3 to the Declaration of Timothy W. Cook and filed on December 12, 2023, and allow Socure to make an unsealed, redacted filing.

There is good cause for Socure's request. On the morning of December 13, 2023, Socure contacted the Clerk's office by telephone to request that it seal Dkt. No. 67-3 because we discovered that it contained information that we inadvertently failed to redact in accordance with Federal Rule of Civil Procedure 5.2(a). The Clerk's office provisionally sealed Dkt. No. 67-3. We now respectfully request that the Court seal Dkt. No. 67-3 and permit Socure to submit a properly redacted version of Dkt. No. 67-3. The proposed redactions include a personal address and bank account and routing numbers and are otherwise consistent with the redactions applied to a previously filed version of the same document, which was attached as Exhibit 8 to Socure's Motion to Dismiss the Amended Complaint (Dkt. No. 37-8).

/s/ Aric H. Wu

Aric H. Wu

Respectfully submitted, Application granted. Defendant's request to seal Dkt. No. 67-3 is granted. Dkt. No. 68. The information sought to be redacted consists of information that may be redacted pursuant to Fed. R. Civ. P. 5.2. Defendant is directed to file a redacted version of Dkt. No. 67-3 by December 19, 2023. The Clerk of Court is directed to keep Dkt. No. 67-3 under seal and terminate the motion pending at Dkt. No. 68.

SO ORDERED.

Dated: December 15, 2023 New York, New York

United States District Judge